

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:
THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO
THE COMMONWEALTH OF PUERTO RICO; et al.,
v.
QUALITY CONSTRUCTION SERVICES II LLC, ET AL
Debtors

PROMESA
TITLE III
CASE NUMBER: 17BK3283-LTS

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U.S. DISTRICT COURT
SAN JUAN, PR

REQUEST FOR EXTENSION

TO REPLY TO INFORMATIVE MOTION OF THE COMMONWEALTH OF PUERTO RICO
PUERTO RICO SALES TAX FINANCING AUTHORITY, THE PUERTO RICO HIGHWAYS AND TRANSPORTATION
AUTHORITY, THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH
OF PUERTO RICO AND THE PUERTO RICO PUBLIC BUILDINGS AUTHORITY REGARDING THREE HUNDRED
SEVENTY FOUR OMNIBUS OBJECTION (SUSTANTIVE) TO LATE FILED CLAIMS AND THREE HUNDRED
NINETY SEVEN OMNIBUS OBJECTION TO LATE FILE CLAIMS

TO THE HONORABLE UNITED DISTRICT JUDGE LAURA TAYLOR SWAIN:

Quality Construction Services II LLC by own right represented by its president, Edwin Ralph La Torre Rodríguez, hereby respectfully state as following:

1. Quality Construction Services II LLC filed the proof of claim in this case even though it was never notified that the Public Buildings Authority had filed a bankruptcy by Title 3 of PROMESA despite the fact that it owes \$500,000.00 to Quality Construction Services II LLC according to the Judgment issued by the Court of First Instance, Civil Núm. K AC2008-0018.
2. The lack of adequate notification caused that Quality Construction Services was not guaranteed due process of law and that the debt ratified by the Judgment of the Court of First Instance, was considered as an unsecured debt when it is a secured debt.
3. For these purposes and in order to be able to present our opposition through a legal representative, it is requested that this Honorable Court grant an extension of 30 days to announce our legal representative and reply to the discharge ability motion presented.

Dated: 31/05/2022

Respectfully submitted,


Edwin Ralph La Torre Rodríguez

President

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